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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA SALAS
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA; ROBERT
VACCARI; JAKE ADAMS; and DOES
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

**STIPULATION FOR LEAVE TO
ALLOW PLAINTIFFS TO FILE A
CONSOLIDATED OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT,
CURRENTLY DUE FEBRUARY 27,
2025, THAT EXCEEDS THE WORD
COUNT LIMIT PURSUANT TO
LOCAL RULE 11-6.1**

TO THE HONORABLE COURT:

Plaintiffs L.C., a minor by and through her guardian *ad litem* Maria Cadena; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez; A.L., a minor by and through her guardian *ad litem* Lydia Lopez; and Antonia Salas Ubaldo (“Plaintiffs”) and Defendants State of California, by and through the California Highway Patrol, Michael Blackwood, Isaiah Kee, Bernardo Rubalcava (“State Defendants”), County of San Bernardino, Robert Vaccari, and Jake Adams (“County Defendants”) (collectively “Defendants”), hereby stipulate for the purpose of requesting that the Court grant Plaintiffs leave to file a Consolidated Opposition to Defendants’ Motions for Summary Judgment that exceed the word count limit pursuant to Local Rule 11-6.1, such that Plaintiffs’ Consolidated Opposition may not exceed **12,000** words.

1. On February 20, 2025, County Defendants filed a Notice of Motion and Motion for Summary Judgment, or in the Alternative Summary Adjudication (“County Defendants’ MSJ”). (Doc. No. 103). The hearing for County Defendants’ MSJ is currently set for March 20, 2025. (*See id.*).

2. Also on February 20, 2025, State Defendants filed a Notice of Motion and Motion for Summary Judgment as to the Third Amended Complaint “(State Defendants’ MSJ”). (Doc. No. 105). The hearing for State Defendants’ MSJ is currently set for March 20, 2025. (*See id.*).

3. Pursuant to Local Rule 7-9, Plaintiffs’ Oppositions to County Defendants’ MSJ and State Defendants’ MSJ is due February 27, 2025, 21 days before the March 20, 2025 hearing.

4. Under the Local Rules, Plaintiffs are entitled to file two separate Oppositions to each respective Motion for Summary Judgment. Under Local Rule 11-6.1, each Opposition brief must not exceed 7,000 words. Thus, Plaintiffs would be entitled to a total word count of 14,000 between the two Oppositions.

1 5. However, because County Defendants' MSJ and State Defendants'
2 MSJ both arise out of the same incident and address claims that arise out of the same
3 nucleus of facts, Plaintiffs contend that it would be more efficient for Plaintiffs to
4 file a Consolidated Opposition to both Motions for Summary Judgment. However,
5 because some issues differ between County Defendants and State Defendants, there
6 is a foreseeable need to exceed the 7,000 word count limit for Plaintiffs'
7 Consolidated Opposition.

8 6. Accordingly, the parties hereby stipulate that good cause exists for
9 leave to allow Plaintiffs to file a Consolidated Opposition to County Defendants'
10 MSJ and State Defendants' MSJ, with a word count that does not exceed **12,000**
11 words, including headings, footnotes, and quotations but excluding the caption, the
12 table of contents, the table of authorities, the signature block, the certification
13 required by L.R. 11-6.2, and any indices and exhibits.

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1 **IT IS SO STIPULATED.**

2 DATED: February 21, 2025

LAW OFFICES OF DALE K. GALIPO

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Bv /s/ *Hang D. Le*
Dale K. Galipo
Hang D. Le
Attorneys for Plaintiffs

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9 DATED: February 21, 2025

ROB BONTA
Attorney General of California
CHRISTINE E. GARSKE
Supervising Deputy Attorney General

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*/s/ Diana Esquivel**

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DIANA ESQUIVEL
Deputy Attorney General
*Attorneys for Defendant State of Cal., by and
through the CHP, Blackwood, Kee, and
Rubalcava*

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DATED: February 21, 2025

LYNBERG & WATKINS

Bv /s/ *Anita K. Clarke**
Shannon L. Gustafson
Amy R. Margolies
Anita K. Clarke
Attorneys for Defendants
COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur with the filing's content and have authorized the filing.